

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 4 1999

Ms. Karyn J. Fought, Ph.D.
Environmental Affairs Specialist
Salesco Systems. U.S.A.
5736 West Jefferson Street
Phoenix, AZ 85043

Dear Dr. Fought:

This responds to your letter of December 1, 1998 requesting additional clarification on issues relating to fluorescent light ballast disposal and recycling the metal components.

Your letter asks the following questions:

1. For facilities that are recycling/disposing of regulated ballasts (greater than or equal to 50 ppm PCBs) under the decontamination provisions, are any permits required (i.e. Commercial Storage)?
 - A. A commercial storage approval (40 CFR 761.65(d)) is required for any owner or operator of a facility storing more than 500 liquid gallons or 70 cubic feet of PCB waste that is generated by others.
2. Can a facility that has submitted an application for a Commercial Storage permit store PCBs in quantities of greater than 500 liquid gallons while their permit application is under review by the EPA?
 - A. No. An owner or operator of a facility seeking approval as a commercial storer of PCB waste as defined in 40 CFR 761.3 under 40 CFR 761.65(d) is prohibited from storing PCB waste generated by others in quantities greater than 500 liquid gallons or 70 cubic feet at their facilities after August 2, 1990 unless they submitted, by August 2, 1990, a complete application for a final storage approval. Facilities that submitted their application before August 2, 1990 or are approved as commercial storers are listed on EPA's PCB home page at "www.epa.gov/pcb"

DHannemann:dh/OPPT-NPCD-FOB/31December1998/7404/260-3961/ET8351:C:\WP\Letter\salesco2.wpd
File:FOB;CHRON-READING;AUTHOR:Ltr. to Dr. Karyn Fought, SalesCo, Phoenix, AZ/RE: Fluorescent light ballast
potting material over 50 ppm, PCB commercial storage approval, PCB commercial storage, 500 liquid gallons, 70 cubic feet

CONCURRENCES							
SYMBOL	7404	7404					
SURNAME	<i>[Signature]</i>	<i>[Signature]</i>					
DATE	31 Dec 98	1/4/99					

If you have any additional questions or require additional clarification of the above answers, please contact David Hannemann of my staff at (202) 260-3961.

Sincerely,

John W. Melone, Director
National Program Chemicals Division



December 1, 1998

Dave Hannemann
U.S. EPA
Mail Code 7404
401 M Street, Southwest
Washington, D.C. 20460

Dear Mr. Hannemann:

I am writing to thank you for your November 3, 1998 letter in which you responded to several questions regarding fluorescent lamp ballast disposal and decontamination. In addition, I am writing to request clarification on several additional issues concerning ballast disposal, as addressed under the PCB Disposal Amendments Final Rule.

With respect to fluorescent lamp ballast disposal and decontamination, our understanding is that facilities will no longer be required to obtain an alternative disposal technology approval, but will require a Commercial Storage permit if they are storing greater than 500 liquid gallons (1.89 cubic meters) of PCBs. We also understand that those facilities with alternative disposal permits will not be required to renew their permits, providing they meet those standards of the decontamination provisions of 40 CFR 761.79. Salesco Systems USA requests clarification on ballast disposal in the form of the following questions:

1. For facilities that are recycling/disposing of regulated ballasts (greater than or equal to 50 ppm PCBs) under the decontamination provisions, are any permits required (i.e. Commercial Storage)?
2. Can a facility that has submitted an application for a Commercial Storage permit store PCBs in quantities of greater than 500 liquid gallons while their permit application is under review by the EPA?

Salesco would like to thank you for your time in reviewing our questions and providing clarification on the aforementioned disposal issues. I look forward to hearing from you soon regarding your synopsis and appreciate your time and assistance. Thank you.

Sincerely,
SALESCO SYSTEMS USA, INC

A handwritten signature in cursive script that reads 'Karyn J. Fought'.

Karyn J. Fought, Ph.D.
Environmental Affairs Specialist



NATIONAL SALES & MATERIAL CONTROL OFFICE

5736 WEST JEFFERSON STREET • PHOENIX, ARIZONA 85043 • (800) 368-9095 • (602) 233-2955 • FAX (602) 415-3030



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 4 1999

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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Environmental Affairs Specialist
Salesco Systems. U.S.A.
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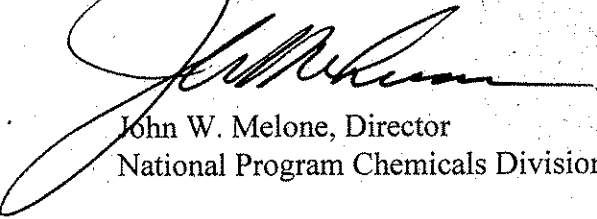
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If you have any additional questions or require additional clarification of the above answers, please contact David Hannemann of my staff at (202) 260-3961.

Sincerely,



John W. Melone, Director
National Program Chemicals Division